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March 15, 2024

VIA ECF

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Wang vs. Keeper Holdings, Inc., Steven Yang & Katy Lee*

Dear Judge Cogan,

Plaintiff Heung Yol Kim (“Plaintiff”) respectfully files this letter pursuant to your honor’s Mandatory Requirements for Initial Status Conference.

1. Brief description of the case:

- a. Plaintiff worked for the defendants as a live-in domestic helper in Queens County, New York. Plaintiff also performed work for the individual defendants’ company taking care of various chores and errands including driving, boxing, and shipping. Plaintiff is alleging minimum wage and overtime wage violations under FLSA and NYLL. Plaintiff further alleges violations of time of hire wage notice requirement, spread of hours pay requirement, pay stub issuance violation, and Day of Rest violation, all under NYLL.
- b. Plaintiff claims that she worked 6 to 7 days a week from September 1, 2015 to January 15, 2024, averaging about 87 hours per week. Yet, she received a fixed salary of \$600/week to \$750/week. Defendants did not track plaintiff’s work hours.
- c. Jurisdiction: Jurisdiction is proper in this Court because all defendants reside in this judicial district and Keeper Holdings, Inc.’s annual revenue exceeded \$500,000 during the relevant liability period.

2. Any contemplated motions:

- a. Plaintiff is not contemplating filing any motion at this time.

Respectfully submitted,

/s/Ryan J. Kim
Counsel for Plaintiffs

Cc: Tristan Loanzon, Esq. (via ECF)